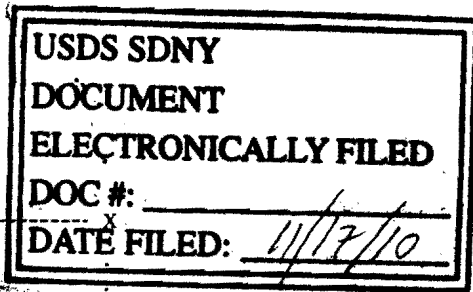


KARAS,

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



In re:

Application of CHEVRON

: 10 MC 00002 (LAK)
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This Document Applies to: ALL CASES
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[PROPOSED] ORDER TO SHOW CAUSE WHY STEVEN DONZIGER SHOULD NOT BE COMPELLED TO PRODUCE FORTHWITH ALL DOCUMENTS RESPONSIVE TO CHEVRON'S SUBPOENA, INCLUDING ALL DOCUMENTS ON HIS PRIVILEGE LOG ON WAIVER GROUNDS

On November 17, 2010, petitioner Chevron Corporation ("Chevron") submitted to this Court a Motion by Order to Show Cause to compel Steven Donziger to produce forthwith all documents responsive to Chevron's subpoena, served on Donziger on August 9, 2010, including all documents on Donziger's privilege log on waiver grounds.

The Court has considered the evidence and arguments presented, and sufficient reason appearing, the Court rules as follows. It is hereby:

ORDERED that Chevron Corporation shall serve counsel for Respondent Steven Donziger and counsel for the plaintiffs in the Lago Agrio Litigation, by hand, facsimile, or e-mail, with the Memorandum of Law in Support of its Motion and this Order on or before 5:00 p.m. on November 17, 2010; and

ORDERED that papers in opposition to the Motion, if any, shall be served ^{and filed electronically} by hand, ~~facsimile, or e-mail upon Chevron's counsel, Gibson Dunn & Crutcher LLP, 200 Park Avenue, 47th Floor, New York, New York,~~ ^{at} on or before 10:00 a.m. on Friday, November 19, 2010; and

[Handwritten signatures and initials]

ORDERED that Respondent Steven Donziger must show cause before this Court, at the United States District Courthouse, Courtroom 12D, 500 Pearl Street, New York, New York, on Monday, November 22, 2010 at 11:00 a.m. ~~4:00 p.m.~~ why an order should not be made compelling

Donziger to produce forthwith all documents responsive to Chevron's subpoena, *and it is further*

IT IS SO ORDERED.

Dated: 11/17/10


United States District Judge

ORDERED that this order shall not be construed to imply that Donziger is not already in violation of a previous order that required the production & certification of all documents responsive to the subpoena.